

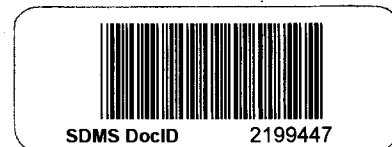
ROHM AND HAAS COMPANY  
100 INDEPENDENCE MALL WEST, PHILADELPHIA, PA 19106-2399 USA  
TELEPHONE: (215) 592-3000 FAX: (215) 592-2661



July 1, 2013

Via Certified Mail

Kenneth I. Rose, III  
Financial Analyst (3HS62)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029



**Re: Supplemental Submission of Information  
Metro Container Site, Trainer, Pennsylvania**

Dear Mr. Rose:

This letter responds to EPA's January 4, 2013 letter, directed to Rohm and Haas Company, seeking supplemental information regarding the Metro Container Site (the "Supplemental Request"). Rohm and Haas Company, on behalf of itself and its subsidiary Rohm and Haas Chemicals LLC (collectively, "Rohm and Haas"), herein supplements its February 22, 2013 response to EPA's Supplemental Request. Rohm and Haas has discovered additional responsive information that is enclosed with this letter.

By providing this supplemental information, Rohm and Haas in no way waives its objections raised in its previous correspondence with EPA. This supplemental submission incorporates all of Rohm and Haas' objections set forth in its May 4, 2012, November 1, 2012, and February 22, 2013 letters to EPA (the "prior responses"). Rohm and Haas is producing the document enclosed with this letter subject to, and without waiver of, each and every one of the objections raised in Rohm and Haas' prior responses. The enclosed document is stamped with Bates numbers ROH03551 to ROH03553.

Respectfully submitted,

Shannon S. Callahan, Esq.

Enclosure

MICROFILMED  
OCT 24 1985

cc: J. C. Brock  
W. J. Ferry  
V. L. Klein  
A. A. Kober  
W. P. Moore  
G. C. Murdoch ✓  
T. Otsuka  
Writer  
Files: 7671,89, .92

DEU-84-424

Bristol, July 30, 1984

MEMO TO: Mr. G. A. Schnabel  
FROM: P. D. Rosenstock  
SUBJECT: TRASH GUIDELINES  
REFERENCE: GASchnabel/List, 7/20/84

Our comments on the proposed trash guidelines discussed in the reference are listed below.

1. Drums that have been emptied of their contents are sold to reconditioners for cleaning, repair and resale. Thus, drums do not enter the "trash" stream. A problem here is that we have heard reports from the field that drums with our logo on them are turning up at disposal sites. This is a problem which must be addressed. Note that the source is both reconditioned drums and product drums used by our customers for disposal.
2. Bags that have been emptied are bundled and now are disposed of as trash. We can segregate bags if it is required. We suggest that the segregation be done on an individual basis, but that all bags which contained FDA approved materials automatically fall into the "trash" category.

A listing of the bag raw materials used at Bristol, excluding pigments, is given in the attached table.

3. The "pallets contaminated by dry emulsion" category in the attachment to the reference should have a "\*\*\*" footnote and not the "\*" shown. Note that pallets are now being sold to a pallet repair/reconditioning outlet and thus do not enter the "trash" stream. It has been our experience that pallets are rarely contaminated.
4. We feel that cartridges, disposable clothing, etc., from non-hazardous operations represent a de minimus situation and are not worth segregating.

ROH03551

5. We feel that "Kydex Cut-Offs" should remain as "trash." We have extensive analysis data to support this contention.
6. We would add single-use laboratory ware in aqueous service to the "trash" list. Single-use items in non-aqueous service can also be added if the material is removable with water washing (i.e. throwaway pipettes, eye droppers).
7. Single-use laboratory ware, whether or not they are in aqueous service, should be excluded from trash if the materials in them are not water rinsible.



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P. D. Rosenstock

hr

BRISTOL RAW MATERIALS PURCHASED IN BAGS(1,2)

Raw Material  
Number  
(8-)

Raw Material

|      |                                 |
|------|---------------------------------|
| 0031 | Calcium Chloride                |
| 0034 | Monoammonium phosphate          |
| 0043 | Disodium phosphate              |
| 0055 | Monosodium Phosphate            |
| 0057 | Stearic acid                    |
| 0058 | Lime*                           |
| 0063 | Oxalic acid*                    |
| 0070 | Filter Cel                      |
| 0077 | Sodium bicarbonate              |
| 0079 | Beet pulp                       |
| 0098 | Wheat bran                      |
| 0090 | Calcium carbonate               |
| 0100 | Sodium carbonate                |
| 0111 | Soybean meal                    |
| 0158 | Corn starch                     |
| 0197 | Sodium chloride                 |
| 0290 | Super Cel                       |
| 0323 | Blood meal                      |
| 0332 | Attaclay X-250                  |
| 0350 | Celite 560                      |
| 0392 | Stearyl/myristyl alcohols       |
| 0434 | Beef liver meal                 |
| 0440 | Maleic anhydride*               |
| 0451 | Sodium citrate                  |
| 0511 | Magnesium citrate               |
| 0603 | Celite 545                      |
| 0626 | Sodium bicarbonate              |
| 0660 | Corn hominy                     |
| 0730 | Corn sugar                      |
| 0732 | Versene*                        |
| 0754 | Phenothiazine*                  |
| 0798 | Corn starch                     |
| 0834 | Speedex                         |
| 0875 | Sodium persulfate *?            |
| 0904 | Citrus pulp                     |
| 1013 | Celite 512                      |
| 1020 | Hyflo Super Cel                 |
| 3026 | Potassium carbonate             |
| 1051 | Azo 66LP*                       |
| 1125 | PVC                             |
| 4066 | Sodium chloride (Kosher)        |
| 4079 | Zinc oxide/Kadox 515*           |
| 4027 | Piccotex LC*                    |
| 4325 | Flake flour salt                |
| 4347 | Pentareithritol*?               |
| 8638 | Diamond flour salt              |
| 8715 | Loxol HOB 7121                  |
| 8716 | Loxol HOB 7107                  |
| 0895 | Itaconic acid                   |
| 0897 | Diphenyl paraphenylene diamine* |
| 1326 | Activated carbon                |
| 1556 | Cellosolve acetate butyrate*?   |

ROH03553

From: (215) 592-2850  
Marco Baker  
ROHM and HAAS COMPANY  
100 Independence Mall West  
7th Floor  
Philadelphia, PA 19106

Origin ID: BBXA



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ActWgt: 1.0 LB  
CAD: 8829898/NET3370

Delivery Address Bar Code



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BILL SENDER

Kenneth I. Rose, Financial Analyst  
U.S. Environ. Protection Agency  
1650 Arch St.

PHILADELPHIA, PA 19103

Ref # Metro Container Supp. ltr  
Invoice #  
PO #  
Dept #

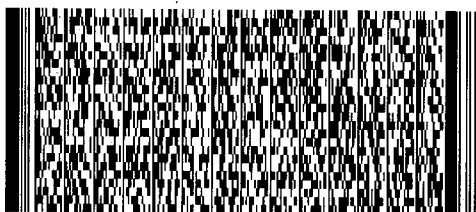
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